

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
Southern Division**

<b>D. G. Sweigert, Pro Se Plaintiff</b>  <b>-against-</b>  <b>MULTIMEDIA SYSTEM DESIGN, INC. d/b/a CROWDSOURCE THE TRUTH, d/b/a 21<sup>st</sup> Century 3D</b>  <b>A New York Corporation</b>  <b>And</b>  <b>George Webb Sweigert</b>  <b>Defendants</b>	<b>PRO SE</b>  <b>CASE:</b>  <b>2:22-cv-12696-GAD-KGA</b>  <b>District Judge Gershwin A. Drain</b>  <b>Magistrate Judge Kimberly G. Altman</b>
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**Plaintiff Pro Se**  
**D. G. SWEIGERT**  
[Spoliation-notice@mailbox.org](mailto:Spoliation-notice@mailbox.org)

**Defendants**  
**MULTIMEDIA SYSTEM DESIGN, INC.**  
[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
[jason@21stcentury3d.com](mailto:jason@21stcentury3d.com)  
**GEORGE WEBB SWEIGERT**  
[Georg.webb@gmail.com](mailto:Georg.webb@gmail.com)

**ANNEX OF EXHIBITS TO AMENDED COMPLAINT**

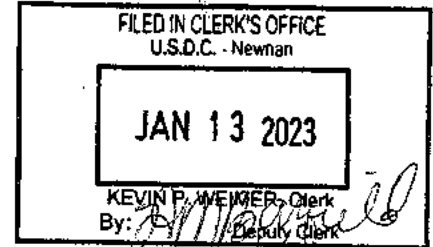
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Hereby certified that a true .PDF file of this document has been transmitted via electronic message to the parties named above. Signed this 23rd day of January (1/23/2023).



**D. G. SWEIGERT PRO SE, C/O  
PMB 13339, 514 Americas Way,  
Box Elder, SD 57719**

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
AT ATLANTA**



**George Webb Sweigert,**

**Plaintiff,**

**And Jane Does and John  
Does to be named later**

**Defendants**

:  
:  
:  
:  
:

**CASE NO - v.  
1:22-CV-02946-SEG**

**v.**

**AMENDED**

**PLAINTIFF'S COMPLAINT**

**CABLE NEWS NETWORK, INC.,  
(based in Atlanta, Georgia)**

**DEFAMATION AND FALSE**

**and**

**LIGHT WITH JURY DEMAND**

**Mr. Donie O'Sullivan  
(resident of New York City, New  
York)**

**and**

**Jane Does and John Does at  
Cable News Network**

**NOW COMES** George Webb Sweigert (“George Webb Sweigert”), and by and through his own pro se counsel, and states his Amended Complaint for Defamation and False Light against CNN Reporter Donie O’Sullivan and Cable News Network, Inc. (“CNN”) as follows:

**INTRODUCTION FOR CAUSE OF DEFAMATION ACTION AND  
FALSE LIGHT**

1. Between June 17th, 2017 and January 10th, 2023, the time of this writing, CNN Reporter Donie O’Sullivan and CNN brought down the full force of its corporate power, influence, and wealth on the Plaintiff, Journalist George Webb Sweigert, by falsely attacking, vilifying, and bullying him, making him the target of public condemnation, ridicule, and scorn, inflicting irreparable harm through a reckless disregard for facts, despite the fact that he was simply a journalist reporting on national security stories of worldwide interest and importance. CNN and Reporter Donie O’Sullivan’s banner headline was “Conspiracy Theorists Said She Started CoronaVirus, Now She’s Afraid For Her Life”. Also, CNN and Reporter Donie O’Sullivan have done numerous stories beginning with the title, “She’s Been Falsely Accused Of Starting The CoronaVirus Pandemics”. These are completely false and defamatory headlines that still exist on CNN news sites and YouTube channels to this day.



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Conspiracy theorists said she started the coronavirus pandemic. Now she's afraid for her life.



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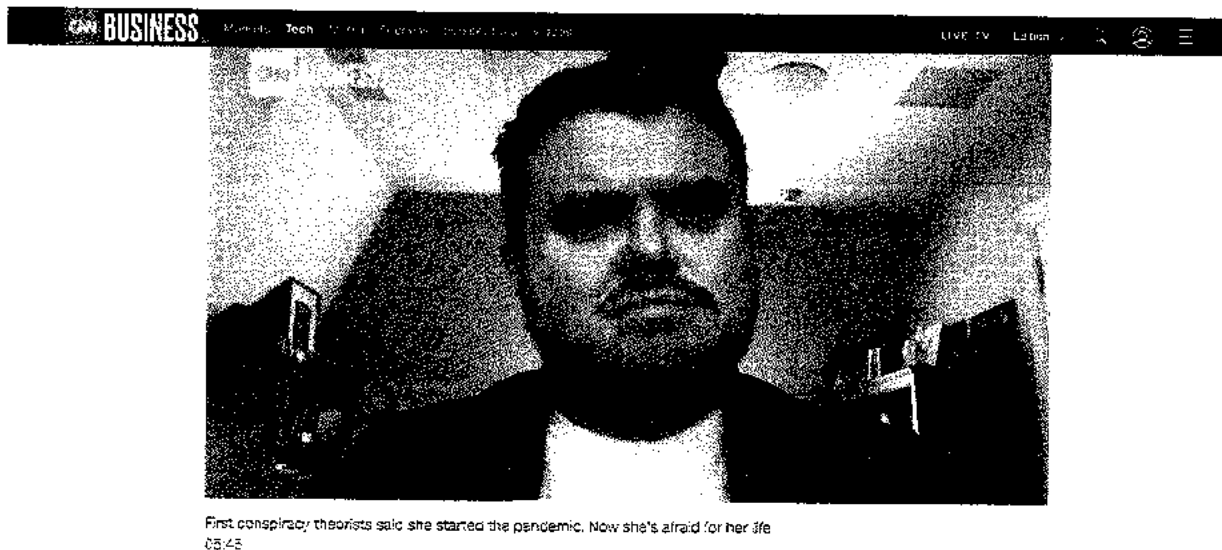
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Share

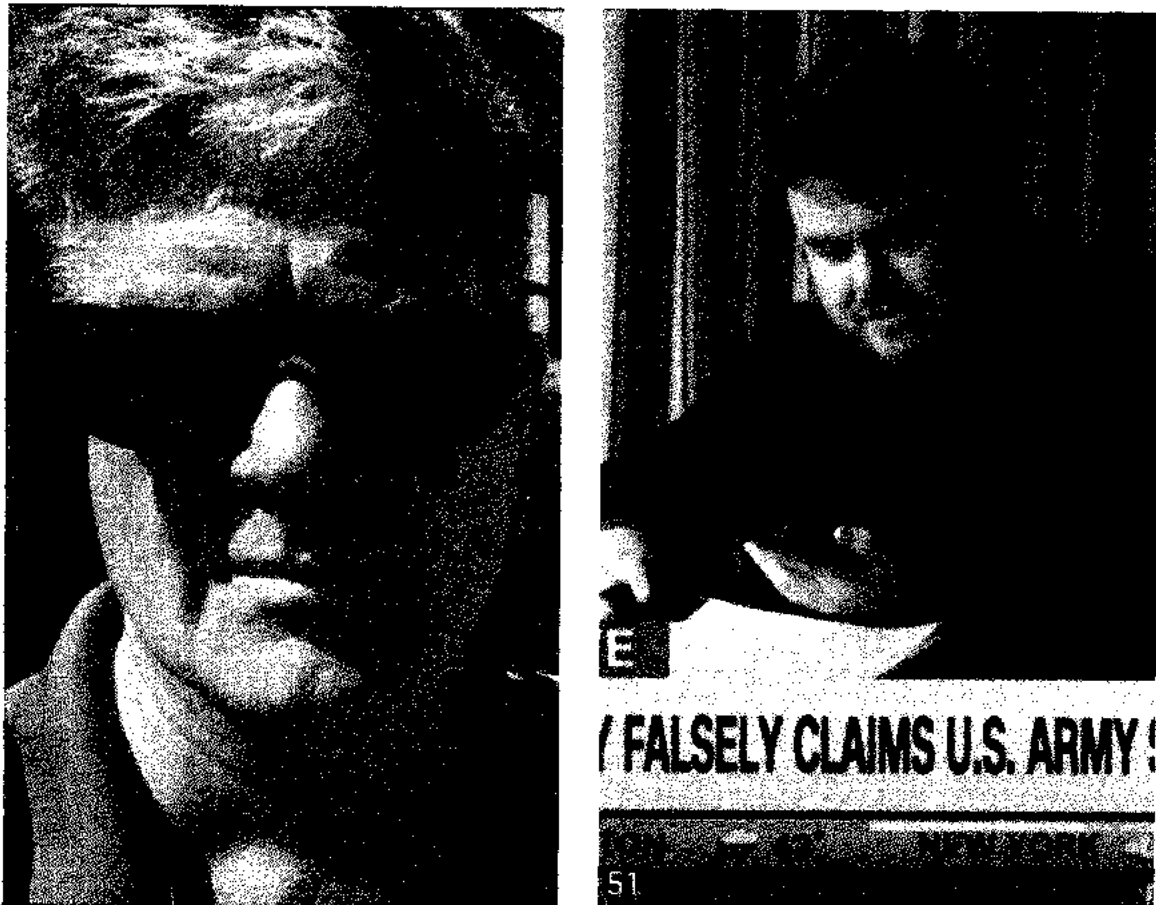


April 27th, 2020



**Exclusive: She's been falsely accused of starting the**

These are completely false and defamatory headlines. CNN has suppressed a recorded interview between CNN Reporter Donie O'Sullivan and Plaintiff George Webb where he asks Donie O'Sullivan, "Who said anything about her being contagious". The Plaintiff goes on to say the Armed Diplomatic Security Service officer in question was vaccinated according to confidential sources at Fort Belvoir, Virginia.



## **"Who Said Anything About Her Being Contagious" - George Webb To Donie O'Sullivan Of CNN, March 2020**

Clearly, the Plaintiff was not reporting the Armed Diplomatic Security Services Officer was spreading anything. But CNN and Reporter Donie O'Sullivan spread their false narrative anyway because it meant high audience ratings and personal career advancement for all who spread the defamation.

2. The CNN false narrative was knowingly completely inaccurate, and CNN top management decided this was a false narrative to ride all the way to the Annual News Emmy Awards. For instance, CNN Reporter Donie O'Sullivan never acknowledged

his story about the Plaintiff reported on came from a communique from the Chinese Foreign Ministry as an accusation about the US State Department responsibility in protecting China from sick athletes. As a National Security journalist, the Plaintiff only researched US State Department personnel at the 2019 Wuhan Military Games, and the Plaintiff researched no athletes that were not active US State Department representatives of the US Government.



**maatje benassi**

Armed Diplomatic Security Officer at DOS

#### Experience



#### Armed Diplomatic Security Officer DOS

Aug 2017 – Present · 2 yrs 8 mos  
Washington D.C. Metro Area



**maatje benassi**

Armed Diplomatic Security Officer at DOS

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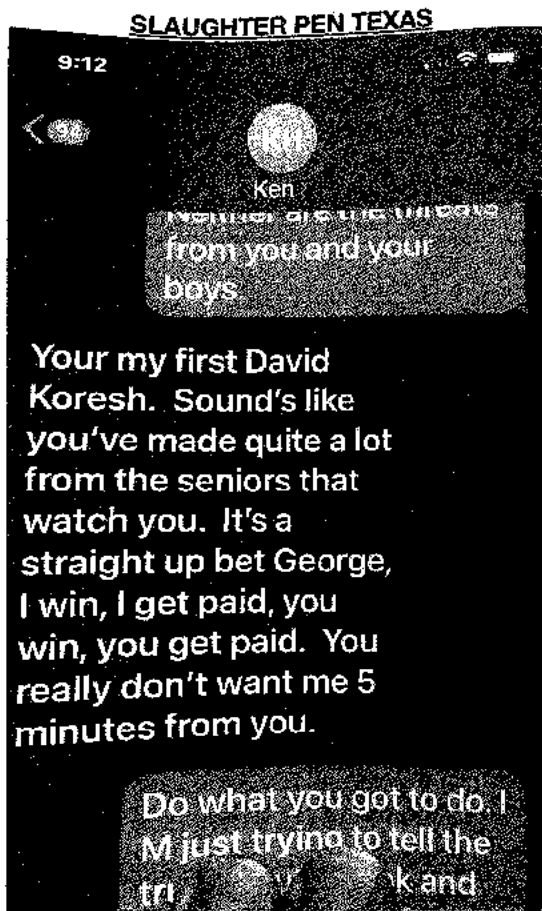
Jan 2012 – Jun 2015 · 3 yrs 6 mos  
Stuttgart Area, Germany

Driver for the Allied Nato Supreme Commander four star Gen. Completed the Anti terrorism Evasive Driving Course and Lean Six Sigma Green Belt. Operations Sergeant working with Protocol, receiving incoming and out coming travel orders for higher ranking personnel. Maintain logbook data.

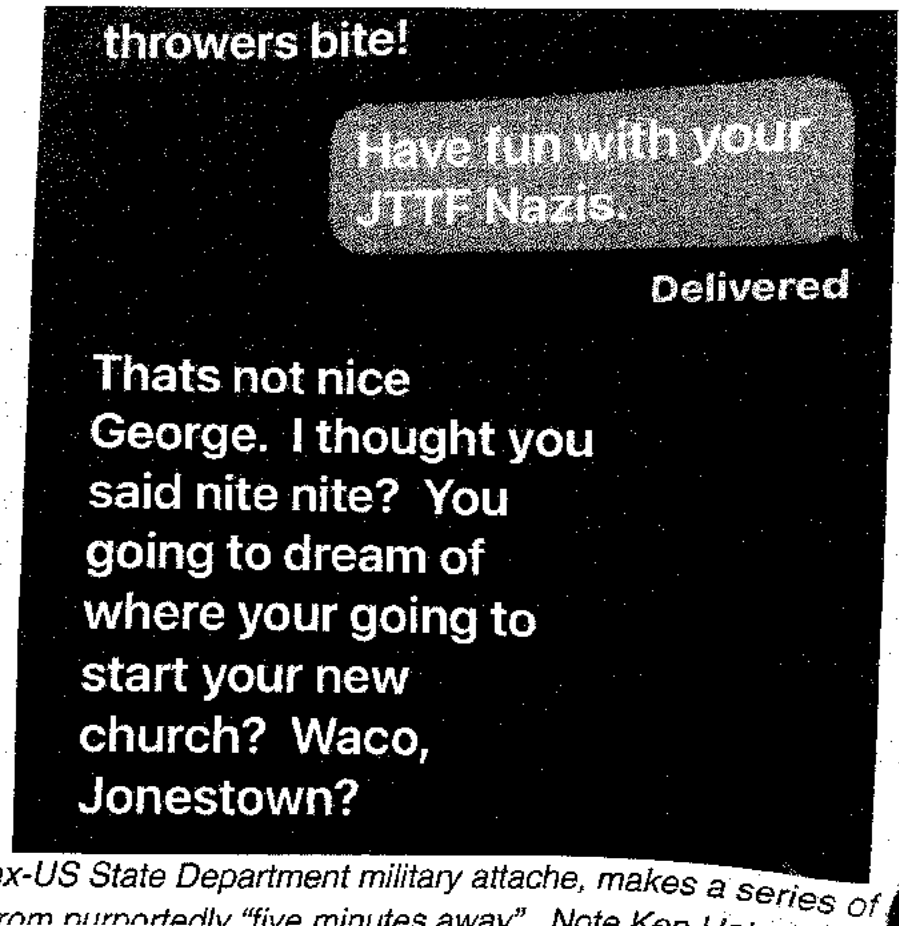
Instead, CNN Reporter Donie O'Sullivan never mentioned the Chinese Government source was the source of the Plaintiff's story in his smear of the Plaintiff, and presented the story as something the Plaintiff picked out of thin air.



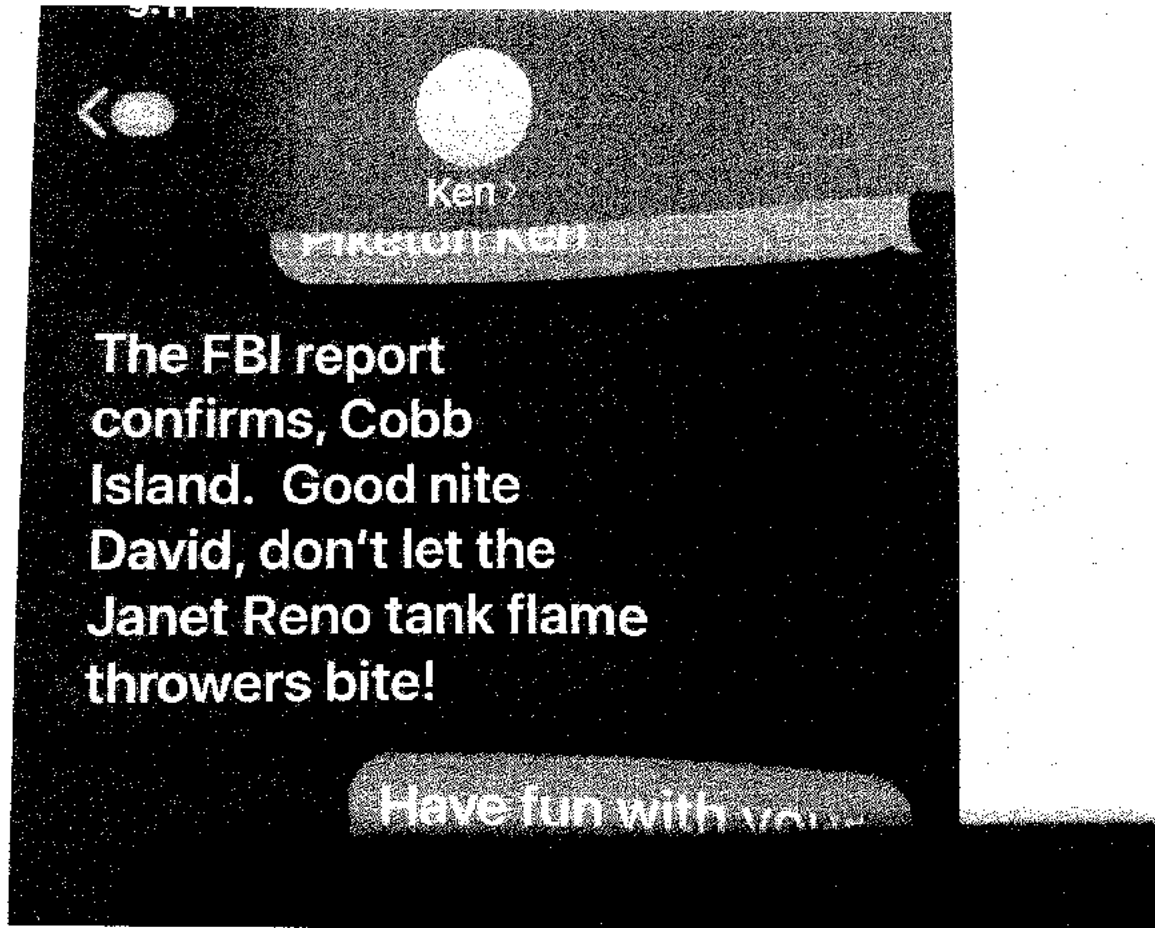
3. CNN Reporter Donie O'Sullivan and CNN perpetrated a hoax the Plaintiff, Mr. George Webb Sweigert, wished ill and bodily harm on the subject of his reporting, US State Department Armed Diplomatic Security Service Officer Maatje Benassi, when in actual fact, the Plaintiff had been the recipient of the death threats from an ex-US State Department Military Attache named Ken Hale.



US State Department Military Attache threatens the Plaintiff by texting, "You are my first David Koresh". This message from Ken Hale was provide to CNN Reporter Donie O'Sullivan before he filed his report.



US State Department Military Attache threatens the Plaintiff by harkening Waco and Jonestown massacres. This message from Ken Hale was provide to CNN Reporter Donie O'Sullivan before he filed his report.



The Plaintiff provided these death threats in text form with a confirming phone number from Mr. Hale to CNN Reporter Donie O'Sullivan before his smear story on the Plaintiff aired. Mr. Sullivan chose to completely reverse the facts of the story, falsely claiming the Plaintiff was a perpetrator of threats against a "US Army Sergeant Reservist", hiding the fact the Plaintiff was the actual victim of death threats, and hiding the subject in question was an active, US State Department Diplomatic Security Services Officer at the 2019 Wuhan Military Games, in his smear story news broadcasts about the Plaintiff.



## Distinguished Driver for High eucom

Jan 2012 – Jun 2015 · 3 yrs 6 mos  
Stuttgart Area, Germany

Driver for the Allied Nato Supreme

maatje benassi

Armed Diplomatic Security Officer at DOS

Woodbridge, Virginia · 24 connections · Contac

In addition, CNN Reporter Donie O'Sullivan not only never mentioned Maatje Benassi was an Armed Diplomatic Security Services Officer for the US State Department, but he suppressed the death threats made by a US State Department Military Attache Ken Hale who threaten to "Jonestown" and Waco" the Plaintiff's family with "flamethrowers", even before the Plaintiff was covering the Wuhan, China story.



4. This unchecked vigilante journalism by CNN Reporter Donie O'Sullivan, a practice of accusing others of his own reprehensible behaviour, has embolden CNN Reporter Donie O'Sullivan and CNN to publish the real time coordinates of his and CNN's political foes. Elon Musk recently accused CNN Reporter Donie O'Sullivan of publishing his "assassination coordinates", for instance, as recently as of December, 2022.



5. Even though ex-US State Department Military Attache Ken Hale and Conspirator Coreen Stoughton, the daughter of a long time DARPA technologist, openly bragged of their conspiracy help CNN manufacture this hoax about the Plaintiff, including the hacking of the Plaintiff's Twitter account and the hacking of his emails accounts, CNN Reporter Donie O'Sullivan and CNN still did not pull their hoax story which was first published in April of 2020 to a worldwide audience. The CNN hoax story is still being republished and promoted to this day (January 10th, 2023), culminating this hoax being promoted by CNN top management at the 2021 News Emmy Awards.



These award nominations still appear on the National Television Arts and Sciences  
"New Emmy" nominations awards for 2021 as of January 10th, 2023.

[theemmys.tv/news/42nd-nominations/](https://theemmys.tv/news/42nd-nominations/)



The screenshot shows the 42nd Emmy Awards nominations page for the category "Outstanding Short Feature Story in a Newscast". At the top, there is a banner for "NEWS & DOC" with a "SHOW LOG" link. Below the banner, the category name "Outstanding Short Feature Story in a Newscast" is displayed. Three nominees are listed in a grid:

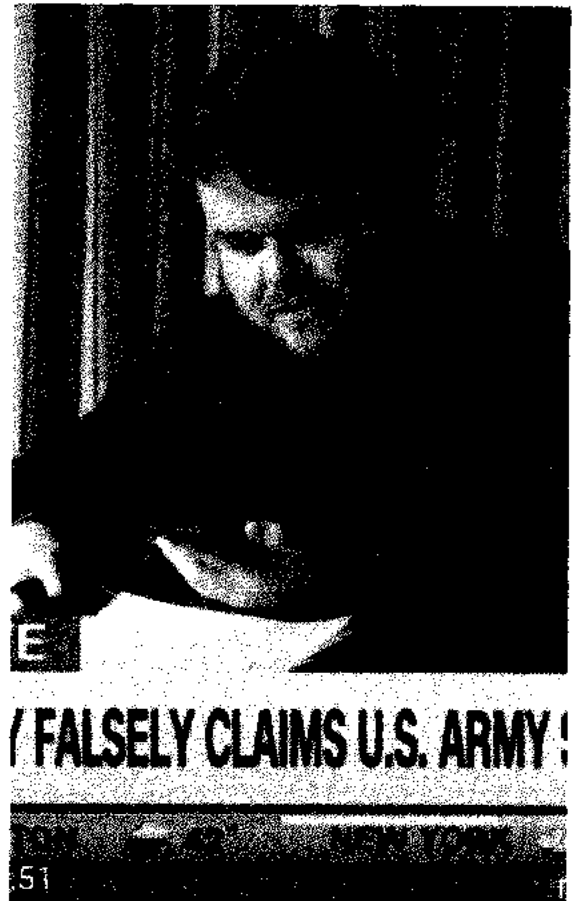
Nominee	Story Title	Status
CNN Business	Conspiracy Theorists Said She Started the Coronavirus Pandemic. Now She's Afraid for Her Life.	Nominee
CNN Newsroom	The Body Collectors	Nominee
Vice News	The Kids Being Trained and Armed to Fight Mexican Cartels	WINNER

Below each nominee's name is the CNN or Vice logo. The Vice News entry is marked as the "WINNER".

CNN Reporter Donie O'Sullivan still basks in the False Light narrative he created from his false narrative and his complete reversal of the facts in his report.



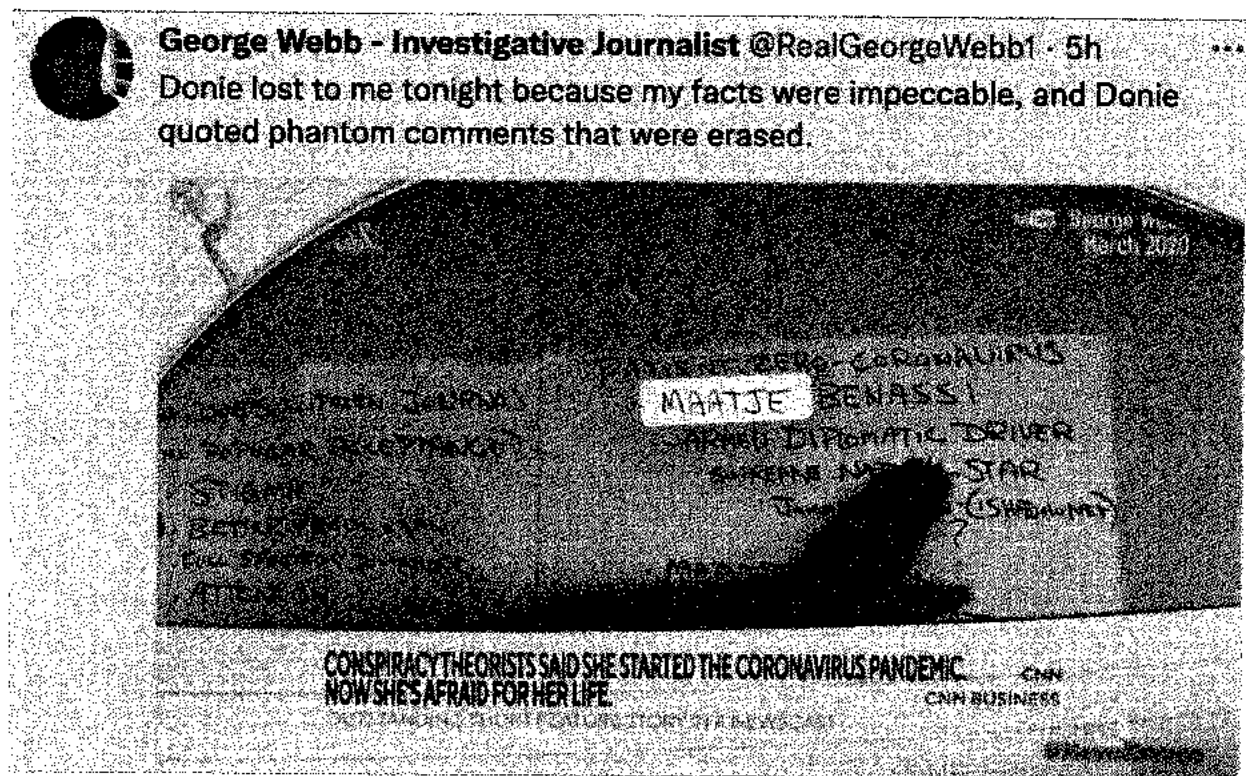
6. Despite broadcasting taped interviews between the Plaintiff and CNN Reporter Donie O'Sullivan where the Plaintiff plainly asks, "Who said anything about her being contagious", CNN Reporter Donie O'Sullivan still chose to report the Plaintiff claimed the subject of the report, Armed Diplomatic Security Service Officer Maatje Benassi, was contagious. The Plaintiff even gets CNN Reporter Donie O'Sullivan to say the words "raise antibodies from a vaccination" in a taped interview with the Plaintiff, showing he understood the Plaintiff was only claiming she was vaccinated. The Plaintiff has repeated explained how US State Department "Germ Teams" comprised of Diplomatic Security Services Officers, are often dispatched to "hot zones" before the arrival of VIPs to a large, athletic event or meeting as a standard part of "preparing the ground" for the VIPs visit.



**"Who Said Anything About Her Being Contagious" - George Webb To Donie O'Sullivan Of CNN, March 2020**

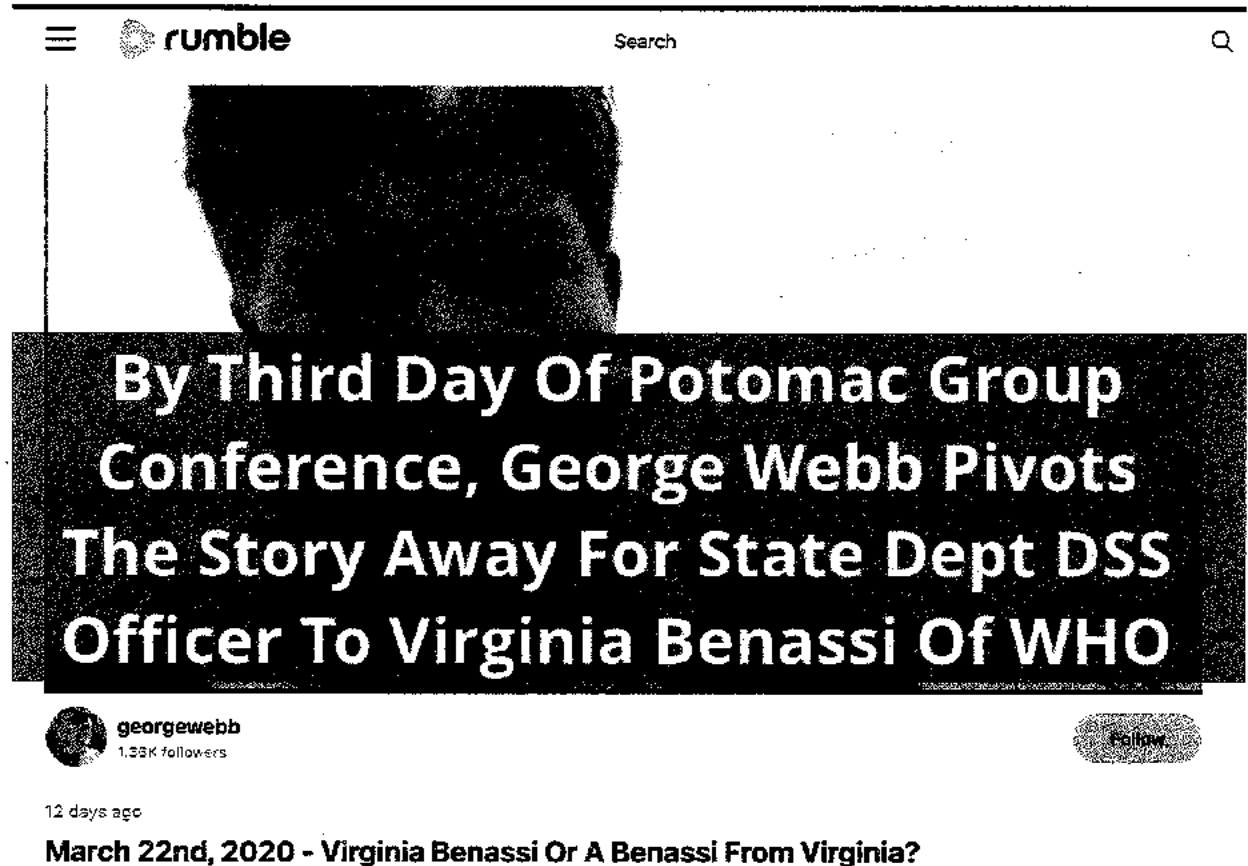
7. Even after Conspirator Coreen Stoughton, daughter of a long time DARPA scientist, publicly and blatantly cheered on ex-US State Department Military Attache Ken Hale, who drove five hours in the middle of the night to threatened Mr. Sweigert's life on the small island of Cobb Island, Maryland, still CNN Reporter Donie O'Sullivan and CNN insisted on publishing the false story about the Plaintiff, knowing there had been a real death threat on Plaintiff George Webb Sweigert's life.. Even though Reporter Donie O'Sullivan was made aware of the Ken Hale death

threats in an interview with Mr. Sweigert in April 2020, Reporter O'Sullivan chose to publicise the false death threats created by Conspirator Coreen Stoughton on the Plaintiff's YouTube site, allowing the Armed Diplomatic Security Services Officer to falsely playing the victim. You can see the false claim in the Emmy promotional video aired during the 2021 News Emmys - "Conspiracy Theorist Said She Started The Coronavirs Pandemic, Now She's Afraid For Her Life". CNN top management and CNN Reporter Donie O'Sullivan knew this was false from the taped recording with the Plaintiff, but they decided to reverse the facts and promote the false narrative anyway.



8. CNN Reporter Donie O'Sullivan and CNN also completely ignored that by the third day of the Potomac Group conference in March 2020, Plaintiff George Webb Sweigert had completely pivoted the research away from the US State Department DSS Officer to Virginia Benassi of the Wellcome Trust and the WHO (World Health

Organization), receiving all the bids at the WHO for CoronaVirus. See the video below entitled, “Virginia Benassi Or a Benassi From Virginia”. The focus of the lab leak was at Ft. Detrick with Sina Bavari, not the US State Department DSS Officer.



CNN Reporter Donie O’Sullivan and CNN chose to ignore this pivot away from the DSS Officer to Virginia Benassi of the WHO, falsely claiming instead that the Plaintiff somehow wished harm on the State Department DSS Officer. The Plaintiff even ask Donie O’Sullivan about “Virginia Benassi”, the mother-in-law of the State Department DSS Officer in a taped interview, and that pivot was ignored by CNN Reporter Donie O’Sullivan and CNN. CNN Reporter Donie O’Sullivan and CNN had a narrative they want to tell, the facts be damned. CNN Reporter Donie O’Sullivan and CNN completely cast the Plaintiff in a False Light, accusing him of leading a

vigilante attack on the State Dept. DSS Officer rather than accurately describing the Plaintiff as a reporter in search of the truth about a story that affect every man, woman, and child in the world.



9. CNN Reporter Donie O'Sullivan and CNN's vicious attack on George Webb Sweigert included at least three (3) defamatory television broadcasts between May 2020 and October 2020 and Thirty Three (33) months of continuous, open, hostile, and malicious posting of defamatory online articles falsely accusing George Webb Sweigert of being a "harasser" of US State Department Armed Diplomatic Security Services Officer Maatje Benassi. When the conspiracy between Conspirator Coreen Stoughton, Ken Hale, and husband Matt Benassi became public almost two years ago, CNN Reporter Donie O'Sullivan and CNN chose not only to retract the story, but rather chose to increase the publicity for the story twenty fold by promoting the hoax at the 2021 News Emmy Awards in September of 2021. Since the 2021 News Emmys,

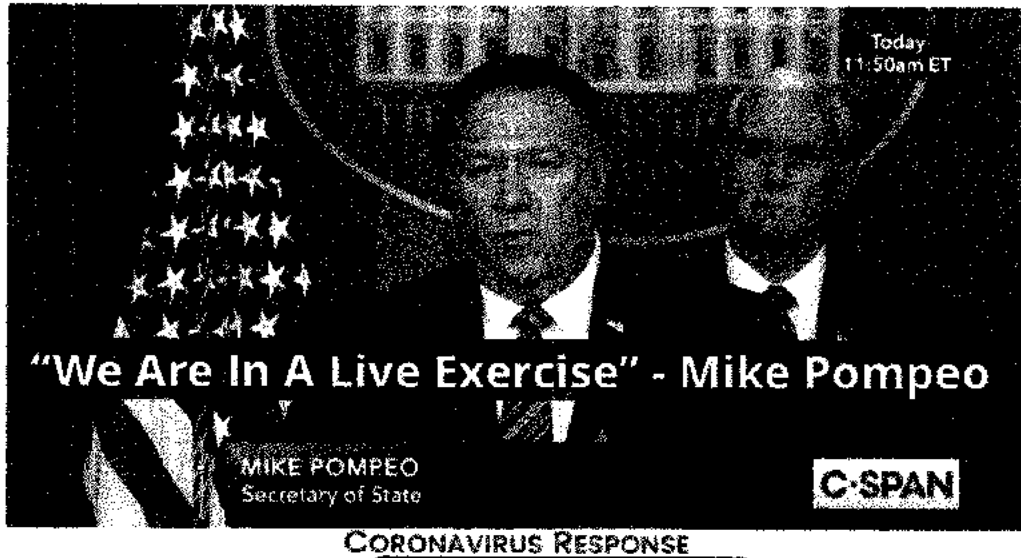
this brazen behaviour has only amplified CNN Reporter Donie O'Sullivan and CNN's confidence they are about the law. In fact, CNN Reporter Donie O'Sullivan went on with CNN Host Anderson Cooper to gloat about encouraging youths to publish the real time coordinates of celebrities like Elon Musk.



10. CNN compounded its irreparable harm against Plaintiff George Webb Sweigert by republishing and re endorsing its malicious and false claims at the highest level of CNN management at the annual News Emmy awards of September of 2021, placing Plaintiff Sweigert in a completely False Light. The Plaintiff, in a recorded interview, let CNN Reporter Donie O'Sullivan know that the US State Department was conducting a Live Exercise with a program called USAID PREDICT, and a number of whistleblowers supported this fact finding. CNN Reporter Donie O'Sullivan chose to say the Plaintiff had "no evidence", and just wished harm on the subject of the report. CNN Reporter Donie O'Sullivan has never issued a retraction on this point.

User Clip: "We are in a live exercise, here." - Mike Pompeo

President Trump said "Shouldn't we let you know?" - "It's one of the things that Trump is doing more transparently than he ever did before. (You should know what we're doing)".



11. CNN again compounded its irreparable harm against Plaintiff George Webb Sweigert by republishing and re endorsing its malicious and false claims at the US Senate by engaging Senator Mark Warner to repeat and rebroadcast CNN's false claims in January of 2022, again placing Plaintiff Sweigert in a completely False Light. The Plaintiff never "targetted" the US State Department Armed Diplomatic Service Officer, and the Plaintiff's YouTube channel had already been destroyed months earlier by YouTube. O'Sullivan adds the gravitas of a US Senate sponsor to his egregious reversed claims, knowing he in fact is covering up the death threats against the Plaintiff while acting as if the Plaintiff meant harm to the Armed Diplomatic Security Services Officer.



Donie O'Sullivan  
@donie

Sen. @MarkWarner's office reached out to YouTube yesterday asking why it hadn't taken down videos targeting Maatje Benassi.

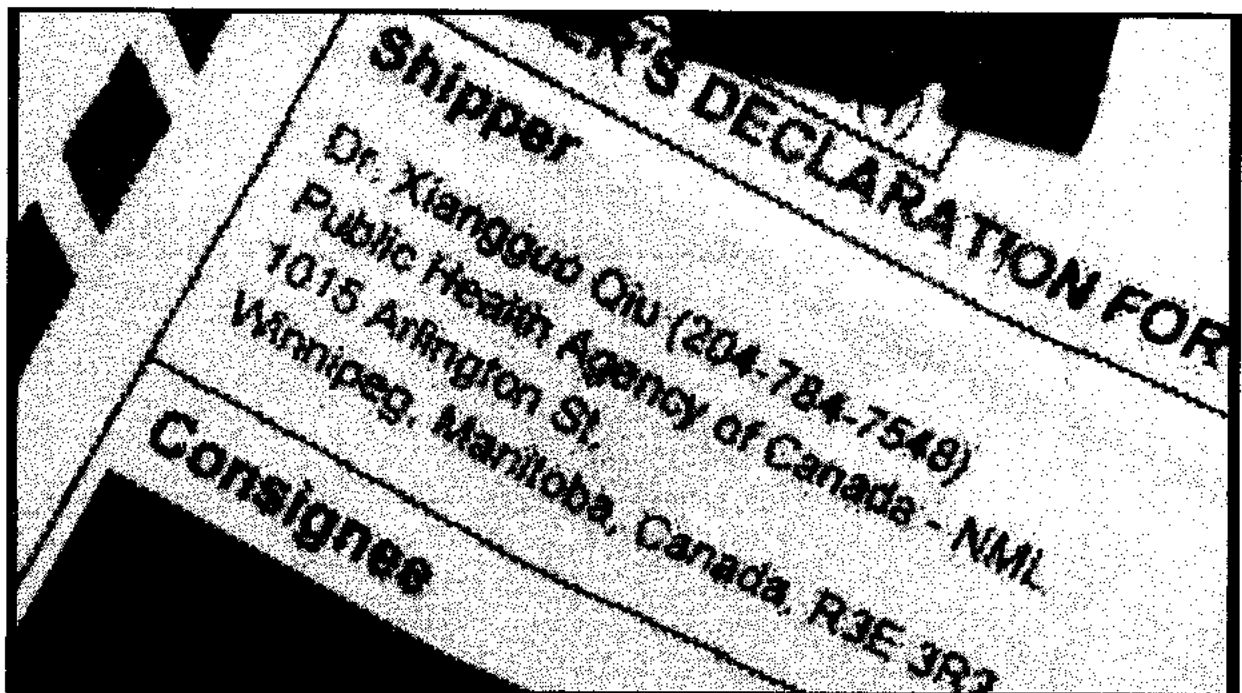
Warner: "this shouldn't be something that requires attention from a major news network and a U.S. Senator to fix."



12. CNN Reporter Donie O'Sullivan and CNN continued the attacks on Journalist George Webb Sweigert, in June of 2020, making outlandish and false claims that somehow wished harm on the subjects of one of his news reports, the so-called "Patient Zero" of the Wuhan Military Games, who was always portrayed as a victim. Plaintiff George Webb Sweigert will present a recording between himself and CNN Reporter Donie O'Sullivan where he repeatedly calls "Patient Zero" a victim, and repeatedly Sweigert says his source at Ft. Belvoir Community Hospital said "Patient Zero" would raise antibodies for a CoronaVirus like threat in Wuhan. CNN later learned that all US State Department personnel going to the 2019 Wuhan Military Games were indeed vaccinated. CNN Reporter Donie O'Sullivan and CNN never printed a correction after learning this fact.

13. Plaintiff Sweigert and a group of ten news gatherers in March 2020 made a full animation film of "What Happened in Wuhan" featuring maps with exact times,

dates, and places with exact names of all participants, to summarize the research on the source of the CoronaVirus at the Wuhan Military Games in October of 2019. The names of the “wrongly accused”, Maatje and Matt Benassi in CNN’s CoronaVirus story, appear nowhere in the film, further proving the Plaintiff was simply reporting a news story of worldwide interest. As you can see below, we were focused on a Dr. Qiu from the Manitoba lab taking pathogens to the Wuhan Institute of Virology, not the Armed Diplomatic Security Services Officer.





The news gathering summary does not even mention the Armed Diplomatic Security Services Officer Maatje or Matt Benassi about what happened at the 2019 Wuhan Military Games. This news summary film proves Plaintiff George Webb Sweigert didn't even consider the Benassis worth a mention in the final rollup of the research.

14. CNN and CNN Reporter Donie O'Sullivan ignored real death threats provided by Plaintiff George Webb Sweigert to CNN Reporter Donie O'Sullivan, clearly showing a Ken Hale, a Navy veteran from the US Naval Base in Norfolk, Virginia had threatened to "Waco" and "Jonestown" George Webb Sweigert's family and make George Webb Sweigert his "first David Koresh". US State Department military liaison Ken Hale also threatened to "flame thrower" George Webb Sweigert's family to death from an active US Navy Base.

15. CNN and Reporter Donie O'Sullivan also ignored text messages from Ken Hale, a Navy Veteran and former official with the US State Department, threatening he was "five minutes away" multiple times on a Saturday evening from the home of George Webb Sweigert's home in Maryland at that time. Instead, CNN Reporter

Donie O'Sullivan and CNN chose to report the Plaintiff somehow wished harm on the Armed Diplomatic Security Services Officer.

16. CNN and CNN Reporter Donie O'Sullivan also ignored text messages provided to Donie O'Sullivan sent by Ken Hale threatening to "flamethrower" the family of George Webb Sweigert.

17. CNN Reporter Donie O'Sullivan and CNN made no acknowledgment of these death threat texts and messages in their story about Plaintiff George Webb Sweigert, creating the False Light that Webb Sweigert was the perpetrator of threats and not the victim of them.

18. Because top management at CNN didn't like the content of Plaintiff Sweigert's story that the CoronaVirus broke out at the 2019 Wuhan Military Games, rather than acknowledging the facts in the story that Plaintiff Webb Sweigert was reporting on active US State Department personnel, CNN, Jeff Zucker, Allison Gollust, and Brian Stelter of CNN sought to make Plaintiff Sweigert into an international pariah, promoting the story in the 2021 Emmy Awards even though Zucker, Gollust, and Stelter knew the story to be a hoax.

### **Specific Statement of Defamation Claim**

19. CNN Reporter Donie O'Sullivan and CNN made accusations that results in Plaintiff Webb Sweigert becoming the subject of international derision are totally and unequivocally false, and CNN would have known them to be untrue had it undertaken any reasonable efforts to read and listen to their own reporter's Donie O'Sullivan's recorded interview with Plaintiff Sweigert. Even a ten minute cursory

listen to their own reporter's interview with Plaintiff Sweigert would have allowed CNN top management to knock down this hoax story. Despite the ease at which the accuracy of the CNN CoronaVirus story could have been verified before publication, CNN top management, Jeff Zucker, Allison Gollust, Brian Stelter, and associates, chose to push the false and defamatory accusations made about Plaintiff George Webb Sweigert in CNN's May through November 2020 reporting about him and to continue to promote the hoax through the 2021 Emmy's in September of 2021.

20. CNN and Reporter Donie O'Sullivan recklessly endangered the life of George Webb Sweigert and his family by outrageously and falsely twisting the real death threats to him by Ken Hale of Norfolk, Virginia by reporting somehow George Webb Sweigert was wishing ill on the subjects of his March 2020 reporting. Reporter O'Sullivan was shown the death threat texts from Ken Hale in April of 2020, before publication of his article on Plaintiff Sweigert, yet he chose to publish fake death threats from the Plaintiff's stalker Coreen Stoughton instead.



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[CNN News](#)

Conspiracy theorists said she started the coronavirus pandemic. Now she's afraid for her life.

21. In a CNN video on YouTube which was published in June 2020 and has been republished every month since, and is still viewable as of July 25th, 2022, O'Sullivan and CNN state "Conspiracy theorists said she started the CoronaVirus pandemic, and now she is afraid for her life", knowing these facts to be a complete twist of the real gist of the factual reporting by George Webb Sweigert. The video still appears on the CNN YouTube page as of January 11th, 2023.

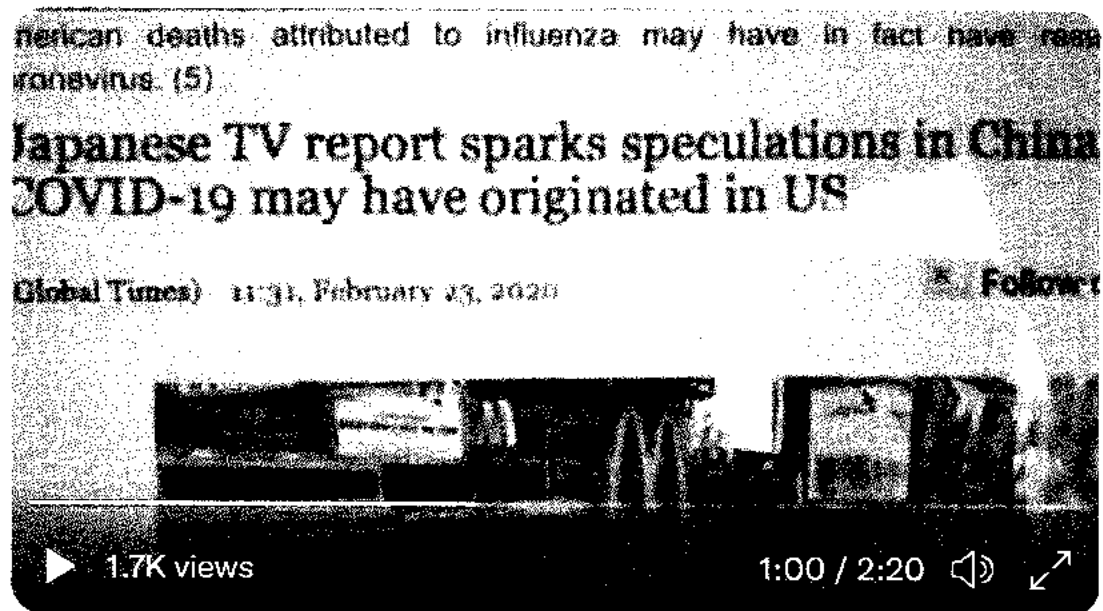
22. In actual fact, Plaintiff George Webb Sweigert convened a group of ten citizen journalists for an in person meeting to fact check stories about the CoronaVirus in

March 2020. Plaintiff Webb Sweigert, here after known as “Webb Sweigert”, initiated the fact checking on a news story brought to him by a White House Reporter from the Chinese Foreign Ministry, an official source, not a conspiracy website. In actual fact, Webb had presented every step of the workshop, fact checking in an open forum, encouraging vetting by the online viewing audience, in a complete open and transparent environment, starting initial fact checking of scientific reports from China, Japan, and Taiwan which far predated Webb’s fact checking conference of March 20th, 2020.



**George Webb - Investigative Journalist** @RealGeorgeWebb1 · Jan 19 ...

As the CNN hearing approaches, we see Donie O’Sullivan and CNN’s malicious and reckless disregard for the facts. The Romanoff article of March 4, 2020 is the smoking gun.



23. CNN repeatedly defamed Plaintiff George Webb Sweigert with false claims that he encouraged bullying of the October 2019 NATO Military Games CoronaVirus victims in national television broadcasts with anchors Jim Sciutto, Poppy Harlow,

and Brian Seltzer in the Summer of 2020, and these interviews still remain viewable on the CNN news website as of July 25th, 2022. These attacks were amplified and publicised to a worldwide audience at the 2021 News Emmy Awards.

24. Contrary to CNN's repeated false reports, George Webb Sweigert presented all the CoronaVirus victims from the October 2019 NATO Military Games as victims including Maatje Benassi of the US team, the French Gold Medalist Elodie Cloude and her fiancé on the French NATO Team. The Italian NATO Team victims were also accurately presented as victims. Plaintiff Sweigert never showed any animosity toward any of the athlete victims of the 2019 Wuhan Military Games.

25. CNN ignored the fact that Plaintiff George Webb Sweigert correctly presented the facts that "Patient Zero" was indeed a current employee of the US State Department as an Armed Diplomatic Security Services (DSS) personnel and the fact she had worked directly for the Supreme NATO Allied Commander. Plaintiff Webb Sweigert reported only US State Department and NATO Headquarters connection of only US Military athletes in the US State Department and NATO delegation, as per the allegation by the Chinese Foreign Ministry. Plaintiff George Webb Sweigert has direct, depository evidence in a phone call with CNN's Donie O'Sullivan asking him the question, "Who said anything about starting the CoronaVirus?" to him twice. George Webb Sweigert used the word "victim" twice when referring to Patient Zero in the same conversation. CNN top management chose to ignore the truth that Plaintiff Webb Sweigert meant no harm to Maatje Benassi and instead chose to published the fake death threats of conspirator Coreen Stoughton.



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1,126,421 views • Apr 27, 2020

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26. CNN Reporter Donie O'Sullivan and CNN rushed to incite a viral social media mob to attack Plaintiff George Webb Sweigert, encouraging CNN's high primetime viewership to condemn Plaintiff George Webb Sweigert as a "harasser". This harassment campaign continues to this day with CNN top management's decision to promote this hoax for the 2021 News Emmy Awards in September of 2021.

27. CNN Reporter Donie O'Sullivan and CNN falsely claimed and created the False Light that George Webb Sweigert had somehow encouraged his followers to go to the home of "Patient Zero" when when they knew this was an outrageously false impression and False Light. It was CNN in fact that showed the home, the interior of

the home, the family, the street the home was on, and even the family dog, not Plaintiff Webb Sweigert.

28. CNN Reporter Donie O'Sullivan and CNN knew George Webb Sweigert had only published information which "Patient Zero" had published herself, with her picture obscured in dark glasses and hidden under a biking helmet. CNN showed a malicious and reckless disregard for the facts, not disclosing CNN and only CNN in fact had shown closeups of "Patient Zero" and her husband, multiple angles of their home and address, numerous pictures inside their home in many different rooms, pictures of their daughter, and even their family dog.

29. CNN Reporter Donie O'Sullivan and CNN failed to also disclose the confederates Coreen Stoughton had provided them illegal access to Plaintiff Sweigert's email, or that fact that Stoughton had hacked Webb Sweigert's Twitter, which may have been the source of blurred anonymous threats CNN ascribed to viewers of George Webb Sweigert's YouTube channel. CNN created a completely False Light in the gist of their reporting to create the impression that Plaintiff George Webb Sweigert wished harm on "Patient Zero" when in actual fact, nothing could have been further from the truth. If "Patient Zero" was in fear of her life, it was CNN, through its associations with hackers and acolytes, doctoring and concocting bogus death threats, that this False Light was created for "Patient Zero's" family. This type of "head hunting" was actively encourage by CEO of CNN, Jeff Zucker, in numerous conference calls with his CNN reporters, encouraging completely false narratives with a reckless disregard for the facts.

30. CNN Reporter Donie O'Sullivan and CNN has a six year record of targeting Plaintiff George Webb Sweigert by the same CNN Reporter, Donie O'Sullivan. CNN

falsely asserted that George Webb Sweigert engaged in a deliberate attempt to create a news hoax in the Port of Charleston when in fact George Webb Sweigert had discounted these initial reports, saying Norfolk, Virginia was a far more likely target. Plaintiff Webb Sweigert clearly contradicted initial reports received by informants, and clearly outlined for CNN Reporter Donie O'Sullivan that any likely attack by the Pakistani terrorist Daewoo Ibrahim would occur at his main drug port, the US Naval Base in Norfolk, Virginia, not at the Port of Charleston. CNN Reporter O'Sullivan again ignored the recorded testimony and went with made up facts for the CNN Port of Charleston story.

31. Despite numerous attempts by George Webb Sweigert to CNN to correct the "Port of Charleston" record, CNN Reporter Donie O'Sullivan and CNN has ignored these requests for sixty (60) months.

#### **SUMMARY OF DEFAMATIONS OF PER SE SLANDER AND LIBEL, FALSE LIGHT**

32. Plaintiff George Webb Sweigert clearly cast the subject of his March 2020 report, Armed Diplomatic Security Services Officer, Maatje Benassi, as a victim of the CoronaVirus while in China for the 2019 Wuhan NATO Military Games. CNN and Reporter Donie O'Sullivan completely twisted this reporting and turned its vast television audience on George Webb Sweigert in public condemnation, resulting in irreparable harm through their malicious and reckless disregard for the facts, culminating in CNN's promotion of the hoax at the 2021 News Emmy Awards in September of 2021.

33. CNN Reporter Donie O'Sullivan and CNN elevated false, heinous accusations of the alleged "harassment" conduct by Plaintiff George Webb Sweigert in a national broadcasts May 2020 through on November, 2020 from social media to its worldwide news platform without adhering to well-established journalistic standards and ethics, including its failure to take the required steps to ensure accuracy, fairness, completeness, fact-checking, neutrality.

34. By ignoring the direct interview of their own reporter, Donie O'Sullivan, with Plaintiff Sweigert completely contradicting the hoax, CNN repeatedly, recklessly, and willfully violated basic, fundamental standards of journalistic integrity in the attacks against Plaintiff George Webb Sweigert, republishing and endorsing the irreparable harm of May 2020 through November 2020 national broadcasts by endorsing these reports in the September 2021 News Emmy Award ceremonies.

35. CNN's agenda-driven fiction about Plaintiff George Webb Sweigert about this March 2020 reporting was not only false and defamatory, it created an extremely dangerous situation by knowingly triggering the outrage of its audience and unleashing that outrage on Plaintiff George Webb Sweigert with its patently false accusations, creating a False Light that George Webb Sweigert somehow wished harm on the subjects of his factual reports.

36. CNN anchors and news personnel openly called for "acts of outrage" against Plaintiff George Webb Sweigert, furthering the mob frothing to its False Light narratives.

37. With its most recent promotion of this hoax at the 2021 News Emmys, CNN's wanton reporting has now moved from outrageous misrepresentation and per se libel and slander to reckless endangerment for the lives of Plaintiff George Webb Sweigert

and his family.

38. Rather than publicly retracting its false, defaming reports about George Webb Sweigert, CNN top management willfully chose to amplify this dangerous and reckless behavior in a worldwide broadcast on October 28th, 2020 and with the October 2021 News Emmy Awards ceremonies, an audience with an estimated 25 million people worldwide.

39. George Webb Sweigert was an easy target for CNN because he had only a small YouTube audience with which to respond to outrageously false and malicious False Light claims and allegations, knowing the CNN audience would shower YouTube and Amazon and other social media outlets with complaints to ban his Free Speech.

40. In addition to its substantial broadcast television and online audience, CNN Reporter Donie O'Sullivan and CNN republished many of its false and defamatory broadcasts and articles to its over 41 million Twitter followers. CNN also republished and re endorsed its malicious and False Light narratives to a 7.4 Million viewer Emmy Award audience in October 2021.

### **A Prayer For Relief And Damages**

#### **DAMAGES**

41. CNN's publication of the False and Defamatory Accusations directly and proximately caused substantial and permanent damage to George Webb Sweigert.

42. CNN's False Light and Defamatory Accusations were republished by third parties and members of the mainstream and social media mob, which made social

condemnation and attacks on Plaintiff Sweigert reasonably foreseeable.

43. CNN's False Light and Defamatory Accusations against George Webb Sweigert are defamatory per se, as they are libelous on their face without resort to additional facts, and as clearly demonstrated here, Plaintiff George Webb Sweigert was subjected to public hatred, contempt, scorn, obloquy, and shame.

44. As a direct and proximate result of the CNN Reporter Donie O'Sullivan and CNN False and Defamatory Accusations and False Light narratives, Plaintiff George Webb Sweigert suffered permanent harm to his reputation.

45. As a direct and proximate result of CNN Reporter Donie O'Sullivan and CNN's False and Defamatory Accusations and False Light narratives, Plaintiff George Webb Sweigert suffered severe emotional and mental distress.

46. As a direct and proximate result of CNN Reporter Donie O'Sullivan and CNN's False and Defamatory Accusations and False Light narratives, George Webb Sweigert is forced to live his life in a constant state of concern over his safety and the safety of his family.

47. CNN Reporter Donie O'Sullivan and CNN published its False and Defamatory Accusations and False Light narratives with actual malice and common law malice, thereby entitling Plaintiff George Webb Sweigert to an award of punitive damages.

48. In order to fully compensate Plaintiff George Webb Sweigert for the reputational harm, emotional distress, and mental anguish caused by CNN Reporter Donie O'Sullivan and CNN's false attacks, this action seeks compensatory damages in excess of Fifty Five Million Dollars (\$55,000,000.00), ten dollars for each estimated person this story reached. The Plaintiff notes here a much greater sum would need to be spent to rectify the harm caused by CNN to reverse the false impression created in

millions of minds around the world.

49. In order to punish and to deter CNN Reporter Donie O'Sullivan and CNN from ever again engaging in false, reckless, malicious, and agenda-driven attacks against journalists in violation of well recognized journalistic standards and ethics, this action seeks punitive damages in excess of One Hundred Million Dollars (\$100,000,000.00).

50. In order to fully compensate Plaintiff George Webb Sweigert for lost income from Patreon, YouTube, banning of 42 Amazon books, banning of 22 Amazon bestsellers, and the harassment against seven books published by his publisher Neighborhood News, caused by CNN's false attacks, this action seeks compensatory damages in excess of Two Million Dollars (\$2,000,000.00).

#### **DECLARATION OF KNOWN FACTS**

51. In March of 2020, Plaintiff George Webb Sweigert correctly reported that Chinese Foreign Minister Spokesman Lijian Jian brought CoronaVirus to Wuhan at the US Military Athletes at the October 2019 NATO Military Games.

52. In March 2020 at the news gathering event in Cobb Island, Maryland that Plaintiff George Webb Sweigert organized, the authors of the World Health Organization's "Virus Blueprint" were outlined as the key persons of interest, Dr. Sina Bavari and Virginia Benassi of the World Health Organization. The Dutch cyclist athlete, Maatje Benassi, was not connected in any way to the production of this document. CNN chose to suppress this information and the real gist of the Plaintiff's story, pushing instead the False Light that Plaintiff Sweigert was accusing Armed Diplomatic Security Services Officer Maatje Benassi.

53. In March 2020 at the news gathering event in Cobb Island, Maryland that Plaintiff George Webb Sweigert organized, a key person of interest, Virginia Benassi of the World Health Organization was highlighted at the person receiving all the vaccine bids for the WHO at the email address benassiv@who.int. The Dutch cyclist athlete, Maatje Benassi, was not connected in any way to receiving these CoronaVirus vaccine bids or this email address. CNN chose to suppress this information and the real gist of the Plaintiff's story, pushing instead the False Light that Plaintiff Sweigert was accusing Maatje Benassi.

54. In March 2020 at the news gathering event in Cobb Island, Maryland that Plaintiff George Webb Sweigert organized, a full animation movie of "What Happened in Wuhan" was created with a Hollywood director and producer Peter Duke, complete with animated maps of plane flights taken by individuals from Winnipeg, Canada to Wuhan. No Benassis appear anywhere in this film, the key deliverable from the new gathering conference. The Armed Diplomatic Security Services Officer, Maatje Benassi, was not connected in any way to the summary film produced at the march 2020 news conference or her name or likeness used in any way. CNN chose to suppress this information and the real gist of the Plaintiff's story, pushing instead the False Light that Plaintiff Sweigert was accusing Maatje Benassi.

55. George Webb Sweigert had been informed in February of 2018 by a doctor at the Ft. Belvoir facility that voluntary vaccine testing sometimes occurred at he Community Hospital facilities of "mock" or "low intensity" viruses to test treatments and vaccines known as US State Department "live exercises". This Ft. Belvoir testimony gave some credence to the fact someone working at the Ft. Belvoir

Community Hospital could inadvertently contract CoronaVirus.

56. Plaintiff George Webb Sweigert had been informed in January of 2019 by a different doctor at the Ft. Belvoir facility that voluntary vaccine testing sometimes occurred at the Community Hospital facilities of “mock” or “low intensity” viruses to test treatments and vaccines known as US State Department “live exercises”. This Ft. Belvoir testimony gave some credence to the fact someone working at the Ft. Belvoir Community Hospital could inadvertently contract CoronaVirus.

57. George Webb Sweigert was informed by Attorney Brian Lloyd that doctors at Ft. Belvoir were willing to come forward and testify about the use of “mock” viruses by the US State Department in new vaccine development. Army Colonel Edward McDaniel who performed VIP and US State Department Dipomatic Security Service personnel health checks at Ft. Belvoir was murdered in his front yard in May 2021. It is not know whether Army Colonel McDaniel was the whistleblower at Ft. Belvoir because Attorney Brian Lloyd also died in the summer of 2021. This Ft. Belvoir testimony gave some credence to the fact someone working at the Ft. Belvoir Community Hospital could inadvertently contract CoronaVirus.

58. An “unknown pneumonia” outbreak had occured in the same city of Ft. Belvoir Community Hospital in Springfield, Virginia in July of 2019 at two different rest homes for elderly residents. Some residents did in fact go to the Ft. Belvoir Community Hospital for treatment. This Ft. Belvoir fact gathering gave some credence to the fact someone working at the Ft. Belvoir Community Hospital could inadvertently contract CoronaVirus.

59. In a working news gathering event with ten people in March of 2020, the name of the Dutch NATO driver was put on a whiteboard, and her employment at Ft.

Belvoir Community Hospital was confirmed. George Webb Sweigert only speculated this Dutch NATO driver was a possible victim at this event, and she had unknowingly been “patient zero”. During this time of intense tension between the United States and China with each side blaming the other for the CoronaVirus, this effort seemed to be the only logical and helpful discussion occurring in the News universe to reduce the name calling and assignment of blame. A simple COVID test seemed to be a fast remedy to diffuse an international incident which was bubbling up in tension to talk of war between the United States and China. The US State Department instead stonewalled on providing this simple information, and the US State Department continues to this day in sharing this simple blood test information from the Wuhan Military Games.

60. Instead of lauding this logical epidemiology approach to actually solving and tracing the CoronaVirus crisis demonstrated by Plaintiff George Webb Sweigert, CNN and Reporter Donie O’Sullivan chose to jump on the attack of Plaintiff George Webb Sweigert yet again. Even after evidence was produced that the Dutch courier was indeed Dutch, had been a driver for the Supreme Allied Commander of NATO, and was indeed employed at Ft. Belvoir Community Hospital for CNN Reporter Donie O’Sullivan, instead of responsibly reporting these facts, decided with CNN top management, to willfully choose to suppress this information from the American people. To compound these gross errors of omission, CNN top management and Reporter Donie O’Sullivan chose to simply say there was no evidence presented to them.

61. Even after the Chinese Foreign Minister specifically requested the medical records of the Dutch cyclist with the NATO High Command experience, CNN top

management and Reporter Donie O'Sullivan continue to push the false narrative there was "no evidence" and no attempt at fair and balanced journalism by Plaintiff George Webb Sweigert, causing yet more irreparable harm and defamation.

62. After dozens of outreaches to the subjects of the story, many of the outreaches broadcast around the world, the subjects of the story instead chose to construct a completely false narrative in close consultation with CNN and Reporter Donie O'Sullivan. CNN Reporter Donie O'Sullivan has no excuse for continuing to push this hoax. He is fully aware of the conspiracy of false death threats concocted by Coreen Stoughton in league with Matthew Benassi.

63. Given CNN's prior misrepresentations and denials of responsibility for correction for the previous 60 months, a reasonable person would expect some modicum of journalistic inquiry to avoid their egregious earlier, uncorrected errors. But the exact opposite behavior was demonstrated by CNN and Reporter Donie O'Sullivan in June 2020 with an irresponsible amplification of previous false narratives about George Webb Sweigert, and CNN top management compound and amplified the hoax with promotion of the story at the 2021 News Emmy Awards.

64. CNN not only unleashed a mob of revenge minded internet trolls to descend on Plaintiff George Webb Sweigert's YouTube Channel, but they actively lobbied for the removal of his channel to deprive him any means of rebuttal against the CNN Media Giant.

65. YouTube responded to CNN pressure by destroying four years of journalistic work that included tens of thousands of source journalistic citations that would fill seven Gutenberg Bibles at last count. No apology has been made by CNN to date or any gesture at restitution for these injuries to the Plaintiff.

66. Instead of taking a sober assessment of the irreparable damage CNN had done to Plaintiff George Webb Sweigert's career and life's work, CNN and Reporter Donie O'Sullivan actively conspired with internet trolls to intensify the damage caused. CNN top management actively witnesses this public lynching, and only encouraged the mob with the promotion of this story at the 2021 News Emmys.

67. CNN and Reporter Donie O'Sullivan continued this character assassination scheme up to one week before the US Presidential Election with yet another false and misleading attack on George Webb Sweigert on October 28th, 2020. Now CNN top management appears to want to trot out this hoax again for the 2022 Congressional Elections with the promotion of this story at the 2021 News Emmy Awards.

68. CNN top management and Reporter Donie O'Sullivan continue to promote their misrepresentations and defamations of George Webb Sweigert to the very minute of this writing, and CNN top management and Reporter Donie O'Sullivan show no signs of abating their actions.

69. At all times, George acted respectfully, responsibly, appropriately, and in a manner consistent with the values instilled upon him by his family and his faith.

#### **DISCUSSION AND ANALYSIS OF THE CNN COVERAGE**

70. The CNN top management attacks on citizen journalism can be understood if one looks at the money mad history of CNN and their continual choice over targeting innocents to dogwhistle their base of rabid followers in deference to journalistic integrity, led in weekly conference calls by their CEO, Jeff Zucker. When viewed

through the lens of false narratives leading to rapacious profits, their contemptible behavior is at least understandable. Copious amounts of recorded conference calls of Jeff Zucker encouraging this “headhunter” of other journalists will be presented at trial.

71. Given this egregious behavior by CNN, a reasonable person might expect CNN top management and Reporter Donie O’Sullivan would be rushing to issue a retraction or a statement of contrition regarding its wanton targeting of a citizen journalist who was just trying to tell the truth. But what may not surprise the Court by this point in the Complaint, CNN top management nor Donie O’Sullivan have ever to the date of the filing of this Complaint issued a formal retraction, correction or an apology to Plaintiff George Webb Sweigert.

### **PARTIES, JURISDICTION, AND VENUE**

72. Plaintiff George Webb Sweigert now resides in Fayette County, Georgia. CNN was founded and continues its main news operations in Atlanta, Georgia. Jurisdiction is properly placed here in the Northern District of Georgia. The Defendant Donie O’Sullivan is a Resident of the State of New York. A diversity jurisdiction is in order since there is a diversity in the citizenship of the Parties. The injuries of the nomination of the CNN hoax story for the 2021 News Emmys in September 2021 occurred while the Plaintiff was living in Fayette County, Georgia. Additional Jane Doe and John Doe Plaintiffs and Defendants for many different US States are possible in this action, depending on the fullness of evidence to be discovered.

73. George Webb Sweigert has been a self financed citizen journalist for the last

six years, selling his two houses to finance his research, and before that he was a network analyst.

74. CNN is a foreign corporation existing under the laws of the State of Delaware with its principal place of business being located at One CNN Center, Atlanta, Georgia 30303. CNN may be served by delivery of a copy of the summons and complaint to its duly-appointed registered agent, the Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.

75. There exists complete diversity of citizenship between Plaintiff, CNN Reporter Donie O'Sullivan, resident of New York, and CNN, a Delaware Corporation headquarter in Atlanta, Georgia.

76. The amount in controversy greatly exceeds Seventy-Five Thousand Dollars (\$75,000.00), exclusive of interests, costs, and attorneys' fees, as required to sustain subject-matter jurisdiction in this Court.

77. This Court has subject-matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a).

78. CNN is the nation's first cable news network and remains a fixture of cable news – both nationally and internationally. CNN and CNN Reporter Donie O'Sullivan has a journalist responsibility to report facts and not make up stories to fit their political narrative.

79. CNN transacts business in the Georgia, Virginia, and New York, including its main news hub in Atlanta, Georgia, through the distribution of its content through cable television and the Internet, and CNN committed the tortious acts identified

herein in the State of Georgia, Virginia at its web site servers, and in the State of New York where stories were created.

80. CNN and CNN Reporter Donie O'Sullivan published these reports, broadcasts and online articles identified herein in the State of Georgia, New York, and Virginia for availability worldwide, on a 7 by 24 hour basis.

81. CNN and CNN Reporter Donie O'Sullivan has intentionally sought and obtained benefits from their tortious acts in the State of Georgia, Virginia, and New York.

82. CNN and CNN Reporter Donie O'Sullivan directed its conduct at George Webb Sweigert, a citizen of Georgia.

83. Plaintiff George Webb Sweigert suffered substantial reputational and emotional harm in this District.

84. There is a reasonable and direct nexus between CNN's tortious conduct in Georgia, New York, and Virginia and the harm suffered by George Webb Sweigert in Georgia and beyond.

84. CNN Reporter Donie O'Sullivan and CNN are subject to the jurisdiction of this Court as a resident of the State of New York.

85. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b) because the CNN is subject to personal jurisdiction in this District and/or a substantial part of the events giving rise to this claim occurred in this District, including publication and injury.

#### **CAUSE OF ACTION FOR DEFAMATION**

86. George reasserts and incorporates by reference paragraphs 1 through 85 of this Complaint as if fully restated herein.

87. CNN Reporter Donie O'Sullivan and CNN published to third parties without privilege no less than three (3) false and defamatory television broadcasts from May 2020 to November 2020, three (3) false and defamatory Internet articles, and three (3) false and defamatory tweets of and concerning George Webb Sweigert from May 2020 to January 2021. CNN top management compounded and amplified these torts by promotion of this story at the 2021 News Emmys.

88. As late as October 28th, 2020, CNN and Reporter Donie O'Sullivan posted on its Twitter page and published to approximately 41 million followers false and defamatory gists of their previous defamations of George Webb Sweigert. These false claims were again rebroadcasts and re-amplified in the 2021 News Emmy Awards and by Senator Mark Warner in January of 2022.

89. These CNN Reporter Donie O'Sullivan tweets are collectively referred to herein as the "Tweets."

90. The Tweets, Broadcasts, and Articles are collectively referred to herein as the "False and Defamatory Accusations." As the natural and foreseeable consequence of its actions, CNN knew and intended that its False and Defamatory Accusations would be republished by others, including media outlets and others on social media. These Tweets can still be seen on the Twitter account of O'Sullivan with the full approval of CNN top management.

**George Webb Sweigert IS A JOURNALIST**

91. Plaintiff George Webb Sweigert has a right to Freedom of Speech and Freedom of the Press guaranteed by the Constitution.
92. Plaintiff George Webb Sweigert has always made a practice of fast and very public retractions if every pointed to be in error of a story.
93. Plaintiff George Webb Sweigert does not take money for large corporate advertisers looking for journalists who will look the other way at their transgressions.
94. Plaintiff George Webb Sweigert does not promulgate conspiracy theories like Donald Trump being the agent of Russia as CNN and Reporter Donie O'Sullivan have done like clockwork that last five years.
95. Plaintiff George Webb Sweigert has a reasonable expectation to be protected by the rights guaranteed by the US Constitution and relevant State Law.

**CNN PUBLISHED NEGLIGENTLY AND  
MALICIOUSLY**

**CNN published its False and Defamatory  
Accusations negligently and with actual knowledge  
of falsity or a reckless disregard for the truth.**

96. As one of the world's leading news outlets, CNN top management knew but ignored the importance of verifying damaging news stories, and, in this case, incendiary accusations against a citizen journalist prior to publication.
97. Instead, CNN top management recklessly rushed to publish its False and

Defamatory Accusations about Plaintiff George Webb Sweigert in order to advance its own political agenda.

98. In doing so, CNN top management lifted the incident from social media and placed it in the mainstream media, giving its False and Defamatory Accusations credibility and permanence.

99. CNN top management negligently published its False and Defamatory Accusations by departing from the reasonable standard of care employed by journalists, including those standards articulated by the Society of Professional Journalists' Code of Ethics.

100. CNN's top management collective conduct demonstrates a purposeful avoidance of the truth and the publication of the False and Defamatory Accusations with actual knowledge of falsity following its review of Reporter Donie O'Sullivan's interview with Plaintiff George Webb Sweigert.

101. CNN top management negligently and recklessly published its False and Defamatory Accusations by failing to conduct a reasonable investigation prior to publication.

102. CNN's top management duty to investigate is heightened where, as here, where the June 2020 and November 2020 CNN Reporting compounded the injury. Instead, they compounded the Injury by promotion of the story at the 2021 News Emmy Awards.

103. CNN and CNN Reporter Donie O'Sullivan negligently and recklessly published its False and Defamatory Accusations by relying on unreliable and biased sources with questionable credibility. One conspirator openly brags about hacking into George Webb Sweigert's Twitter and publish false tweets for months. This same

conspirator to this hoax story brags of hacking into George Webb Sweigert's email accounts.

104. CNN top management negligently and recklessly published its False and Defamatory Accusations by failing to conduct a reasonable investigation, including by relying on unreliable sources for its publications.

105. Indeed, CNN top management or its reporters conducted no interviews of George Webb Sweigert's sources.

106. CNN top management consciously elected to ignore this contrary information in favor of its pre-conceived false narrative against George Webb Sweigert and his viewers.

107. CNN top management negligently and recklessly failed to consult publicly available information demonstrating its False and Defamatory Accusations to be false, including, without limitation, other video evidence available online demonstrating the steadfast journalistic discipline of George Webb Sweigert.

108. CNN top management continued to publish its False and Defamatory Accusations with actual knowledge of falsity, having reviewed video evidence and statements of George Webb Sweigert contradicting its False and Defamatory Accusations.

109. CNN top management negligently and recklessly failed to seek information from other obvious sources who were present at the March 2020 fact checking seminar and would have demonstrated its False and Defamatory Accusations to be false, including George Webb Sweigert, and upon information and belief, his wealth of video documentation proving his journalistic integrity.

110. CNN top management negligently and recklessly published its False and

Defamatory Accusations despite internal inconsistencies in despite uncovering information which corroborated George Webb Sweigert's reporting.

111. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to use heightened sensitivity when dealing with citizen journalists.

112. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to verify each before publication.

113. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to avoid stereotyping.

114. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to examine the way in which its own biases and agenda shaped its false reporting.

115. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by failing to treat George Webb Sweigert as a human being deserving of respect.

116. CNN top management negligently and recklessly published its False and Defamatory Accusations in derogation of accepted principles of journalistic ethics, including by wrongfully placing its political agenda over the harm its False and Defamatory Accusations caused irreparable harm to George Webb Sweigert.

117. CNN's top management's actual malice is further evidenced by its failure to retract False and Defamatory Accusations.

118. CNN top management published its False and Defamatory Accusations with common law malice, including because it intended to harm George Webb Sweigert because Webb Sweigert was a disaffected support of the Democratic Party and consciously ignored the threats of harm that it knew would inevitably ensue, in favor of its political agenda.

119. CNN top management published its False and Defamatory Accusations with common law malice, demonstrated by its failure to retract its False and Defamatory Accusations despite the harm and danger it knew would be inflicted upon George Webb Sweigert.

120. CNN top management published its False and Defamatory Accusations with common law malice, including because it callously ignored the consequences of its actions upon a citizen journalist.

121. CNN's top management's common law malice is further evidenced by its failure to reprimand Reporter Donie O'Sullivan for his cyber-assault of George on Twitter.

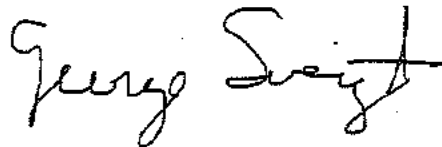
122. CNN's conduct was outrageous and willful, demonstrating that entire want of care that raises a conscious indifference to consequences.

123. Plaintiff George Webb Sweigert is entitled to an award of punitive damages to punish CNN and to deter it from repeating such egregiously unlawful misconduct in the future.

**WHEREFORE**, George Webb Sweigert respectfully prays:

- (a) That judgment be entered against CNN for substantial compensatory damages in an amount not less than Fifty Million Dollars (\$50,000,000.00);
- (b) That judgment be entered against CNN for punitive damages in an amount not less than One Hundred Million Dollars (\$100,000,000.00);
- (c) That judgment be entered against CNN for loss of income damages in an amount not less than Two Million Dollars (\$2,000,000.00);
- (d) That George recover his reasonable attorneys' fees and expenses from CNN;
- (e) That all costs of this action be taxed to CNN; and
- (f) That the Court grant all such other and further relief that the Court deems just and proper, including equitable relief.

Respectfully submitted this 13th day of January 2023.



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